

July 30, 2004

Grants Policy Issuance (GPI) 04-05

Data Quality Standard for the Project Description Field in the Integrated Grants Management System

I. Purpose. The purpose of this policy is to establish a data quality standard for the Project Description field in the Integrated Grants Management System (IGMS).

II. Background. On May 13, 2004, the U.S. Senate Committee on Environment and Public Works issued a report entitled “Transparency in EPA Grants: Web Access to Available Grants and Disclosure of Recipients”. In the report, the Committee concluded that it was difficult to locate information on EPA-funded assistance projects on the Agency’s internet site. The Committee recommended a number of changes to the site to enhance the public’s access to grant information, including improving the quality of grant project descriptions.

The Office of Grants and Debarment developed a plan to respond to the report’s recommendations. One action item under the plan is to develop a data quality standard for the Project Description Field in IGMS.

III. Policy. The Project Description field in IGMS must include a concise, clear description of the purpose of the project. More specifically, the Project Description may not exceed three (3) lines of narrative in IGMS and must address the scope of the project and/or the primary activity to be supported by the grant in a manner that is understandable to the public. (Note that in a word processing document, you would get three lines or less of IGMS text when using a 10-pitch font or larger.) The Project Description should contain media-specific or environmental **KEY TERMS** that may be used as search terms by the public (e.g., air quality, toxins, solid waste, mercury, etc.).

This field must not be used to identify the grant program (e.g., “State Underground Source Protection”). It must not contain language suggesting that EPA grant funds are being used for unallowable costs (e.g., lobbying or suing the Federal government) or for the principal purpose of obtaining goods or services for the direct benefit or use of the Federal government.

Appendix A provides examples of acceptable and unacceptable IGMS project descriptions. (Note that the examples under the “Acceptable” column will appear as three (3) lines or less when displayed in IGMS.)

The Agency must also review the project descriptions of all active grants to non-profit organizations and revise them as necessary to meet the data quality standard in this policy. Revised descriptions must be loaded into IGMS by December 31, 2004.

IV. Anticipated Outcome/Result. The public will understand the purpose and/or primary activity of

a grant by reading the project description.

V. Performance Measures. One or more of the following methods will be used to measure the success of this policy: 1) Data quality reviews conducted by the Grants Administration Division (GAD); 2) Data quality checks of selected IGMS data fields conducted as part of future Grants Management Self-Assessments and GAD Comprehensive Grants Management Reviews; and public feedback to GAD on the accessibility of grant project description data on the EPA internet.

VI. Scope/Applicability. This policy shall apply as follows:

- A. Regional Project Officers and Approval Officials. All funding recommendations created in IGMS after October 1, 2004 must contain project descriptions that comply with this policy.
- B. Regional Grants Specialists and Award Officials. All award documents created in IGMS based on funding recommendations submitted after October 1, 2004, must contain project descriptions that comply with this policy.
- C. Headquarters Project Officers and Approval Officials. Decision memoranda and funding recommendations submitted to the Office of Grants and Debarment after October 1, 2004, must comply with this policy. Those offices using decision memoranda shall include a Project Description (i.e., statement of project scope and/or primary activity) in the first paragraph of the "Objectives" section. Those offices using the electronic funding recommendations will include the Project Description under the "Project Description" section.
- D. Headquarters Grants Specialists and Award Officials. All award documents created in IGMS based on decision memoranda or electronic funding recommendations submitted after October 1, 2004, must contain project descriptions that comply with this policy.
- E. Active Non-Profit Grants. GAD will review project descriptions of all active non-profit grants to determine whether the descriptions comply with this policy. GAD will provide Senior Resource Officials with a spreadsheet of non-compliant descriptions which need to be revised. Program offices will provide GAD with revised project descriptions which GAD will load in IGMS by December 31, 2004.

VII. Roles and Responsibilities. The **Project Officer** must develop a Project Description that complies with this policy and enter it in the IGMS funding recommendation or, for Headquarters project officers not yet using IGMS, the decision memorandum or word processing version of the funding recommendation. The **Approval Official** must ensure that each Project Description complies with this policy. The **Award Official** must ensure that the Project Description complies with this policy before signing the award document. The **Grants Administration Division** will be responsible for conducting data quality reviews of active grants in IGMS for compliance with this policy.

VIII. Keys to Success. EPA staff will understand their respective roles in implementing this policy. The public will better understand the activities EPA is funding with its grants.

IX. Sunset/Review Date. To be sunset with the issuance of the IGMS users manual in 2005.

X. Supersedes/Cancels. This policy expands rather than supercedes existing policy.

XI. References.

- 1. Owner:** Chief, Policy, Information and Training Branch, Grants Administration Division, Office of Grants and Debarment, Office of Administration and Resources Management. (202) 564-5325.
- 2. Key Terms:** Integrated Grants Management System (IGMS), project description
- 3. Reference:** US Senate Committee on Environment and Public Works, report entitled “Transparency in EPA Grants: Web Access to Available Grants and Disclosure of Recipients ”, May 13, 2004

APPENDIX A
Examples of Unacceptable and Acceptable IGMS Project Descriptions

| Unacceptable | Feedback | Acceptable |
|--|---|--|
| CEPP Technical Assistance Grants Program | This is the program name not the project description. | To build the environmental emergency response capability of the San Mateo Pueblo Nation by training members of the tribal emergency response committee and revising the emergency notification plan by January 2006 |
| Survey of internet sites | This is too general and does not adequately explain the purpose or key activity of the project. | The project will increase the quality of scientific data available to non-governmental organizations (NGO's) through implementation of a five-point data quality plan which involves a survey of internet sites and participation in science-based public policy forums. |
| The objectives for the year 2007 are: to increase from 49.7% to 85.0% the proportion of persons who live in Maryland counties that have not exceeded the national air quality standard during the previous 12 months, etc.... The intended outcomes are: a reduction in asthma morbidity, as measured by a reduction in hospitalizations for asthma, to no more than 160 per 100,000 persons (baseline: 188 per 100,000 in 1987).... | Detailed Information on objectives or environmental results does not belong in this field. The IGMS Funding Recommendation has an "objectives" field that asks the PO to "Please describe the project objectives and how the project relates to the statutory authority" and an "environmental results" field where the PO is asked to "describe how the project or program supports the Agency's strategic goal(s)." | This project aims to improve air quality and reduce asthma-related deaths in Maryland counties that have not exceeded the national air quality standard during the previous 12 months by using environmental education and tax incentives. |
| This action approves an extension to the project and budget period to 8/31/04. | This statement belongs under the Project Information section, "Explan. of Changes" field in IGMS, not the project description field. | The project will reduce air pollution from commercial and industrial sites, increase business owners' knowledge of EPA and state pollution prevention regulations, and compile baseline data on community-based industrial and business sites. |
| This project will investigate MB in developing countries. This project will assist in evaluating the transition from MB to alternative PCMs and methods in developing countries. | Acronyms must be defined. While the grantee and EPA program staff may know what the acronyms mean, the public may not know. | The project will investigate methyl bromide (MB) in 21 developing countries. This project will assist the developing countries in evaluating the transition from MB to alternative pest control materials (PCMs) and methods in developing countries. |
| Fellowship | This describes the type of assistance, not the purpose of the project. | The fellow will study the implications of Secondary Mineral Formation on the Fate of Cesium in Aluminosilicate Minerals. The focus of the study will be solid-state nuclear magnetic resonance and will expand on a study currently underway at |

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| Unacceptable | Feedback | Acceptable |
| | | the University of Barton. |

